

The Honorable John H. Chun
Trial Date: April 29, 2024

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

ALEXANDRIA L. ERWIN and
IVAN J. JOHNSON LUCIANO,

Plaintiffs,

VS.

OBI SEAFOODS, LLC.

Defendant.

Case No. 2:22-cv-00893-JHC

**STIPULATED MOTION TO STAY
PROCEEDINGS AS TO PLAINTIFF
IVAN J. JOHNSON LUCIANO**

**NOTED ON MOTION CALENDAR:
September 6, 2023**

Plaintiff, Ivan Johnson Luciano, by and through counsel, Karen Klein, and Defendant, OBI Seafoods, LLC, by and through undersigned counsel (collectively “the Parties”), hereby stipulate to jointly move this Court for an order staying the case as to Plaintiff Ivan Johnson Luciano only due to a settlement agreement by the Parties. In support of this motion, the Parties state the following:

1. On September 5, 2023, the Parties came to a settlement agreement in this matter with Plaintiff Ivan Johnson Luciano.
 2. Plaintiff's counsel, Karen Klein, is currently out of the country and filed a Notice of Unavailability with the Court returning September 25, 2023. Dkt. #39.
 3. Upon Karen Klein's return, the Parties plan to execute a settlement agreement in this matter.

**STIPULATED MOTION TO STAY PROCEEDINGS AS TO
PLAINTIFF LUCIANO - 1
CASE NO. 2:22-CV-00893-JHC**

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Seattle, WA 98101-3122
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4. Due to the delay in executing the settlement agreement, good cause exists for this stay.

5. A stay will afford the parties necessary time to confirm settlement terms and resolve this matter without further expense of judicial resources.

Counsel for both parties have discussed this extension with their respective clients and the Parties agree with this extension.

IT IS SO STIPULATED THIS 6th day of September, 2023.

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**STIPULATED MOTION TO STAY PROCEEDINGS AS TO
PLAINTIFF LUCIANO - 2
CASE NO. 2:22-CV-00893-JHC**

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ORDER

THIS MATTER, having come before the undersigned judge of the above-entitled Court,
based on the foregoing Stipulated Motion, now, therefore,

IT IS HEREBY ORDERED that the case is stayed as to Plaintiff Ivan Johnson Luciano until October 16, 2023, and settlement paperwork shall be filed by the same date.

DATED this 6th day of September, 2023.

John H. Chan

John H. Chun
United States District Judge

**STIPULATED MOTION TO STAY PROCEEDINGS AS TO
PLAINTIFF LUCIANO - 3
CASE NO. 2:22-CV-00893-JHC**

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CERTIFICATE OF SERVICE

I am a resident of the State of Washington, over the age of eighteen years, and not a party to the within action. My business address is One Union Square, 600 University Street, Ste. 3200, Seattle, WA 98101. I hereby certify that on September 6, 2023, I electronically filed the foregoing document titled **STIPULATED MOTION TO STAY PROCEEDINGS AS TO PLAINTIFF IVAN J. JOHNSON LUCIANO** with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following CM/ECF system participants:

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I declare under penalty of perjury under the laws of the State of Washington that the above is true and correct. Executed on September 6, 2023, at Seattle, Washington.

s/ Colette Pringle-Saunders

Colette Pringle-Saunders, Legal Secretary
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